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*WowWee Group Limited,*  
*WowWee Canada, Inc., and*  
*WowWee USA, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WOWWEE GROUP LIMITED, WOWWEE  
CANADA, INC., and WOWWEE USA, INC.,  
*Plaintiffs*

v.

AAIWA ELECTRONIC TECHNOLOGY CO.,  
LTD., ABCDEFGH STORE, ACESPOWER,  
ALLWESOME STORE, ANTHNOY'S  
INTERNATIONAL TRADE, A.K.A. ANTONY  
INTERNATIONAL TRADE, BABY LOVINY  
STORE, BAY KITCHENWARES STORE,  
BEIJING FULIO TECH AND TRADING CO.,  
LTD. A/K/A FULIO, BOOKFONG DOUDOU  
STORE, BUSTRIEND STORE, HCY SCIENCE  
AND TECHNOLOGY LTD. A/K/A HCY  
BONG HIGH CLUB, CIXI CITY MAYEE  
ELECTRIC APPLIANCE CO., LTD.,  
DAVIDHE STORE, DONGGUAN EREALER  
ELECTRONIC TECHNOLOGY CO., LTD.  
A/K/A EREALER INDUSTRIAL  
(HONGKONG) CO., LIMITED, DONGGUAN  
INGLEBY MECHANICAL EQUIPMENT CO.,  
LTD , DONGGUAN MUSHANG

CIVIL ACTION No. \_\_\_\_\_

**MOTION TO EXCEED PAGE LIMIT  
OF PLAINTIFF'S MEMORANDUM  
OF LAW IN SUPPORT OF  
PLAINTIFFS' *EX PARTE*  
APPLICATION FOR: 1) A  
TEMPORARY RESTRAINING  
ORDER; 2) AN ORDER TO SHOW  
CAUSE WHY A PRELIMINARY  
INJUNCTION SHOULD NOT ISSUE;  
3) ASSET RESTRAINING ORDER;  
ORDER AUTHORIZING  
ALTERNATIVE SERVICE BY  
ELECTRONIC MEANS; 4) AND  
ORDER AUTHORIZING  
EXPEDITED DISCOVERY**

**FILED UNDER SEAL**

SILICONE&PLASTIC PRODUCTS CO., LTD.,  
DONGGUAN SEORY DECO CO., LTD. ,  
DONGGUAN YUYANG MUSICAL  
INSTRUMENT CO., LTD. A/K/A MAGNA  
UKELELE GUITAR, E\_SHOP2008 A/K/A  
SHEN ZHEN, EBUY360 OUTLET STORE,  
ECIGMOD, EDC HAND SPIN STORE,  
EIFFELBRIDE, FIDGET SPINNERS STORE,  
FINGER\_MONKEY\_DHGate, FUZHOU  
JOINTOP IMP. & EXP. CO., LTD. A/K/A  
JOINTOP, GUANGZHOU HANG SHENG  
TECHNOLOGY CO., LTD. , GUNTOY  
STORE, HEFEI SUNHOPE TRADE CO.,  
LIMITED, HONG JING BUSINESS, HT  
BOUTIQUE TOY STORE, JINJIANG  
HUIHAO HARDWARE CO., LTD. A/K/A  
JINJIANG HUIHAO HARDWARE PLASTIC  
HANDICRAFT CO., LTD., JOA STORE,  
KID&LOVE STORE A/K/A KIDS & LOVE ,  
KUAILEMENG'S TOY WORLD STORE,  
KYSHADOW A/K/A CRYSTAL  
KYSHADOW, LEADINGSTAR RC TOY  
STORE, LM TOY STORE,  
MAGIC\_PARADISE, MY TOY WORLD,  
NANJING BABYTOP INTERNATIONAL  
TRADING CO., LTD., NINGBO TOPTEN  
INDUSTRY CO., LTD., ONLINE STORE  
236134, OUTDOORCLUBS, PETREL GOO,  
PLEASURE SHOPPING BLOCKS TOY  
STORE, QINGDAO CLUNT BEARING CO.,  
LTD., SAMANTHALEE STORE, SESAME  
TOY STORE, SHAANXI KEYSUN BIO-TECH  
CO., LTD. A/K/A KAI CHENG INDUSTRIAL  
CO., LIMITED, SHANGHAI RONDY TOYS  
CO., LTD., SHANGHAI2010, SHANTOU  
CHENGHAI GUANGYI MEIJIN PLASTIC  
TOYS FACTORY, SHENZHEN AIDAR  
TRADING CO., LTD., SHENZHEN  
ANTHOME TECHNOLOGY CO., LTD.,  
SHENZHEN ARES TECHNOLOGY LIMITED,  
SHENZHEN ASPERO TECHNOLOGY CO.,  
LTD., SHENZHEN ATOY TECHNOLOGY  
CO., LTD., SHENZHEN BAIYI  
TECHNOLOGY CO., LTD., SHENZHEN  
BAOLIFENG OPTO-ELEC CO., LTD.,  
SHENZHEN BETTER NEW GIFT DESIGN

DEPT. A/K/A SZ BETTER LIMITED,  
SHENZHEN BO XIN RONG TECHNOLOGY  
CO., LTD., SHENZHEN BOLT INNOVATION  
TECHNOLOGY CO., LTD., SHENZHEN  
CHUNBELL ELECTRONIC CO., LTD.,  
SHENZHEN CITY SYART TRADE  
COMPANY LTD., SHENZHEN CO-  
FRIENDSHIP TRADING CO., LTD.,  
SHENZHEN DST TECH CO., LTD.,  
SHENZHEN EASYSMOKS TECHNOLOGY  
CO., LTD., SHENZHEN EUNION  
TECHNOLOGY CO., LTD., SHENZHEN  
FAVORITE TECHNOLOGY CO., LTD.,  
SHENZHEN FIRE-WOLF ELECTRONICS  
CO., LTD., SHENZHEN FIVE STAR  
TRADING CO., LTD., SHENZHEN GARUDA  
TECHNOLOGY LIMITED A/K/A GARUDA  
GROUP , SHENZHEN GDC TILLWELL  
TECHNOLOGY LTD., SHENZHEN GOLD  
COST TECHNOLOGY CO., LTD.,  
SHENZHEN GOOKY TECHNOLOGY CO.,  
LTD., SHENZHEN GOWELL TECHNOLOGY  
CO., LTD. (G-WIRELESS), SHENZHEN  
HANBETER TECHNOLOGY CO., LTD. ,  
SHENZHEN HENGFULONG TECHNOLOGY  
CO., LTD., SHENZHEN HI FORTUNE  
TECHNOLOGY CO., LTD., SHENZHEN  
HIPER SONG ELECTRONIC TECHNOLOGY  
CO., LTD., SHENZHEN HLS ELECTRONIC  
TECHNOLOGY LIMITED, SHENZHEN  
HONGTAIDINGYE ELECTRONICS CO.,  
LTD. , SHENZHEN ISM TECHNOLOGY CO.,  
LTD., SHENZHEN IWELLGLOBAL  
TECHNOLOGY CO., LTD., SHENZHEN  
JIEDAKE TECHNOLOGY CO., LTD.,  
SHENZHEN JIJIALASI INDUSTRIAL CO.,  
LTD., SHENZHEN JINGXIN  
SCIENCE&TECHNOLOGY DEVELOPMENT  
CO., LTD., SHENZHEN JINPIN BALANCE  
TECHNOLOGY CO., LTD, SHENZHEN  
JOYSTAR ELECTRONICS CO., LTD.,  
SHENZHEN JUTUO SUPPLY CHAIN CO.,  
LTD., SHENZHEN JXK TECHNOLOGY CO.,  
LTD, SHENZHEN KAREN M ELECTRONICS  
CO., LTD., SHENZHEN KARISIN  
IMPORT&EXPORT CO., LTD., SHENZHEN

KINGSWAY TECHNOLOGY CO., LTD. ,  
SHENZHEN KISN TECHNOLOGY CO.,  
LIMITED., SHENZHEN LANYOS  
INTELLIGENT TECHNOLOGY CO.,LTD,  
SHENZHEN LCOSE ELECTRONIC  
TECHNOLOGY CO., LTD., SHENZHEN  
LEADINGPLUS ELECTRONIC CO., LTD.,  
SHENZHEN LEYI INDUSTRIAL CO., LTD.,  
SHENZHEN LIPENGDA CULTURAL GIFT  
CO., LTD., SHENZHEN LISTING  
TECHNOLOGY CO., LTD., SHENZHEN  
LONG SHENG CENTURY TECHNOLOGY  
CO., LTD., SHENZHEN MYTASTE RJX  
HARDWARE CO., LTD, SHENZHEN  
NAVATA TECHNOLOGY CO., LTD.,  
SHENZHEN NEW IMAGE TECHNOLOGY  
CO., LTD , SHENZHEN OREBO  
TECHNOLOGIES LTD., SHENZHEN  
ORHONG ELECTRONIC TECHNOLOGY  
CO., LTD., SHENZHEN QIO TECHNOLOGY  
CO., LTD., SHENZHEN QUEST  
TECHNOLOGY CO., LTD., SHENZHEN  
SHENYUAN TECH CO., LTD., SHENZHEN  
SKYVIEW TECHNOLOGY LIMITED,  
SHENZHEN SMOFIT TECHNOLOGY CO.,  
LTD., SHENZHEN SPDAK TECHNOLOGY  
COMPANY LIMITED, SHENZHEN SPRI  
TECHNOLOGY CO., LTD., SHENZHEN  
SUNFIRE TECHNOLOGY CO., LTD.,  
SHENZHEN TECHNOLI TECHNOLOGY CO.,  
LTD., SHENZHEN USMART ELECTRONICS  
TECHNOLOGY CO., LTD. , SHENZHEN  
VCEEGO TECHNOLOGY CO., LTD.,  
SHENZHEN VFOCUS ELECTRONIC  
TECHNOLOGY R&D CO., LTD., SHENZHEN  
V-VISION TECHNOLOGY CO., LTD.,  
SHENZHEN WELLCORE TECHNOLOGY  
CO., LTD., SHENZHEN WOW GIFT CO.,  
LTD., SHENZHEN XINGAOSHENG  
TECHNOLOGY CO., LTD., SHENZHEN  
XINHAOYUAN TECHNOLOGY CO., LTD.  
SHENZHEN XZD TECHNOLOGY CO., LTD.,  
SHENZHEN YUWAY TECHNOLOGY CO.,  
LTD. , SHENZHEN Z-COOL TIMES  
TECHNOLOGY CO., LTD., SHENZHEN  
ZMART TECHNOLOGY CO., LTD.,

SHENZHEN ZOOMING ELECTRONIC CO.,  
LTD., AIPIN STORE, SHOP2949193 STORE,  
SHOP319037 STORE, STEPHAN STORE  
STORE, HONG KONG SUPERFAST  
TECHNOLOGY CO. LTD. A/K/A  
SUPERFAST, SUPERGLOBAL, SUZHOU LN  
PROMO CO., LTD., SUZHOU  
SWEETDRESSES WEDDINGDRESS CO.  
LTD. A/K/A SWEETDRESSES, SHENZHEN  
CITY POLY HUI FOREIGN TRADE CO.,  
LTD. A/K/A SZ\_ST\_LUO, SZALONE1, TEEM  
TECHNOLOGY CO., LTD. A/K/A SQUISHIES  
THEA STORE, TUKIIE STORE, TUMI  
OFFICIAL STORE, TUMIPETLIFE STORE,  
XIAMEN JIAYIKANG ENVIRONMENTAL  
TECHNOLOGY CO., LTD., XIAMEN  
WINDSAIL, OUTDOOR GEAR & SPORTING  
GOODS CO., LTD., SHENZHEN BITIAN  
TECHNOLOGY LTD., XQBOSS STORE,  
YIWU BRIOSTA APPARELS FACTORY,  
YIWU CONA SPORTS CO., LTD., YIWU ECO  
BAOYU E-BUSINESS FIRM, YIWU GREEN  
SHINE ARTS & CRAFTS CO., LTD. , YIWU  
GREEN SHINE GIFTS AND TOYS CO., LTD.,  
YIWU HUI ZHE TRADING CO., LTD., YIWU  
KUOTAI TRADING CO., LTD., YIWU  
RUIMIAN E-COMMERCE TRADING FIRM,  
AND ZHIMEI ONLINE A/K/A  
ZHIYUANWEDDING,  
*Defendants*

Plaintiff WowWee Group Limited, Plaintiff WowWee Canada, Inc., and Plaintiff WowWee USA, Inc. (collectively, “WowWee” or “Plaintiffs”), hereby move for an order granting WowWee permission to file a memorandum of law in excess of the page limitations set by the Court in support of WowWee’s *ex parte* application for the following: 1) a temporary restraining order; 2) an order to show cause why a preliminary injunction should not issue; 3) an asset restraining order; 4) an order authorizing alternative service by electronic mail; and 5) an order authorizing expedited discovery against above-referenced Defendants (and more completely identified in Paragraphs 8 through 162 of the Complaint) in light of Defendants’

intentional and willful offerings for sale and/or sales of counterfeit and infringing products (“Application”), which is being filed herewith.

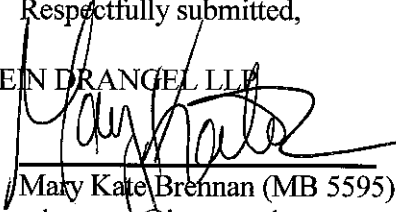
In this District Court, each Judge is allowed to set his or her own rules regarding the page limitations for filing a memorandum of law. Seeing as WowWee is filing its memorandum of law in support of its Application contemporaneously with its initial pleadings, this case has not yet been opened or assigned a Judge. Accordingly, WowWee is unable to ascertain whether its memorandum of law will exceed any page length restriction established by the designated Judge.

As such, WowWee seeks permission to file a memorandum of law in support of its Application that is sixty (60) pages long. WowWee believes that this length is necessary to adequately support its *ex parte* Application for the following: 1) a temporary restraining order; 2) an order to show cause why a preliminary injunction should not issue; 3) an asset restraining order; 4) an order authorizing alternative service by electronic mail; and 5) an order authorizing expedited discovery against Defendants.

Accordingly, WowWee respectfully requests that the Court grant this motion allowing WowWee to submit a memorandum of law in support of its Application which may exceed the page limit instructed by the Court.

A Proposer Order granting this motion is submitted herewith.

Dated: October 16, 2017

Respectfully submitted,  
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